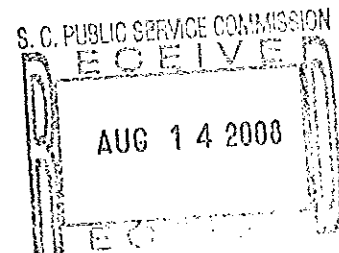


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holly@raysmithlaw.com

COPY

Posted: led

Dept: S.A.

Date: 8/15/08

Time: 10:15

August 12, 2008

VIA FED EX

The Honorable Charles Terreni  
Chief Clerk/Administrative  
Public Service Commission of South Carolina  
101 Executive Center Drive, Suite 100  
Saluda Building  
Columbia, SC 29211

RECEIVED

AUG 14 2008

PSC SC  
DOCKETING DEPT.

**RE: Progress Energy Carolinas, Inc.'s Application for the Establishment of Procedures to Encourage Investment in Energy Efficient Technologies;  
SCPSC Docket No. 2008-251-E**

Dear Mr. Terreni:

Enclosed pursuant to SCCR 103-833 governing discovery, please find a copy of the First Set of Discovery Requests of Wal-Mart Stores East, LP to Progress Energy Carolinas, Inc.

Sincerely,

*Holly R. Smith*

Holly Rachel Smith  
Counsel for Wal-Mart Stores East, LP

ENCLOSURE  
ENCLOSURE  
101 EXECUTIVE CENTER DRIVE, SUITE 100  
SALUDA BUILDING  
PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA  
COLUMBIA, SOUTH CAROLINA 29211  
TEL: (803) 734-1000

**BEFORE  
THE PUBLIC SERVICE COMMISSION OF  
SOUTH CAROLINA  
DOCKET NO. 2008-251-E**

In the Matter of	)	
	)	
Progress Energy Carolinas, Inc.'s Application	)	<b>FIRST SET OF</b>
For the Establishment of Procedures to	)	<b>DISCOVERY</b>
Encourage Investment in Energy Efficient	)	<b>REQUESTS OF</b>
Technologies; Energy Conservation Programs;	)	<b>WAL-MART STORES</b>
And Incentives and Cost Recovery for Such	)	<b>EAST, LP TO PROGRESS</b>
Programs	)	<b>ENERGY CAROLINAS, INC.</b>
	)	
	)	

Pursuant to SCCR 103-833, Wal-Mart Stores East, LP ("Wal-Mart") requests that Progress Energy Carolinas, Inc. ("Progress Energy") answer the interrogatories and produce the documents as indicated below within twenty (20) calendar days of receipt of this request for production and all other discovery requests to which the following request applies.

The Company is requested to provide one copy of all responses to this request to the undersigned counsel and also to:

Steve Chriss  
Wal-Mart Stores East, LP  
2001 SE 10th St.  
Bentonville, AR 72716-0550  
[stephen.chriss@wal-mart.com](mailto:stephen.chriss@wal-mart.com)

Also, with respect to all calculation provided in response to a discovery request, please provide the electronic format with all formulae and links intact.

A copy of this request has been sent to the Chief Clerk of the Public Service Commission of South Carolina.

First Set of Discovery Requests

REQUEST 1-1:

Please provide a copy of all discovery responses, including all attachments, which you have served or hereafter serve on other parties to this docket, in the same form in which you served such responses.

REQUEST 1-2:

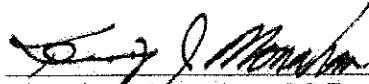
Please provide electronic copies, in Microsoft Excel format with all formulae and links intact, of all workpapers and exhibits.

Dated this 12<sup>th</sup> day of August, 2008.

Respectfully submitted,



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*Attorneys for WAL-MART STORES EAST, LP*